

IN THE UNITED STATES DISTRICT COURT OF THE NORTHERN DISTRICT  
OF GEORGIA

THE DELOACH GROUP, INC. D/B/A,  
QUASTAR COMPUTER INTERNATIONAL

PLAINTIFF

v.

CASE NO: 1:11-CV-1678-JOF

ASHFORD FINANCE LLC, NOUSHIR HASAN,  
CARREFOUR INFORMATIQUE TREMBLANT,  
INC, CORPORATE FUNDING PARTNERS,  
LLC D/B/A GANGES EXPORTS USA,  
LC.COM, LTD., MARSHALL JABLON, MIKE  
TONES, AMIN HAQ, BEEM KHEMANEY

DEFENDANTS

**PLAINTIFF THE DELOACH GROUP, INC. D/B/A QUASTAR COMPUTER  
INTERNATIONAL NOTICE OF RULE 30(b)(6) DEPOSITION OF DEFENDANT  
ASHFORD FINANCE, LLC**

PLEASE TAKE NOTICE that Plaintiff The DeLoach Group, Inc. d/b/a  
Quastar Computer International ("Quastar") will proceed to take the Fed. R. Civ. P.  
30(b)(6) deposition of Defendant Ashford Finance, LLC ("Ashford Finance") at law  
offices of Morgan, Melhuish, Abrutyn, 39 Broadway, Suite 1701, New York, NY  
10006 on February 17, 2015, beginning at 10:00 a.m, and February 18, 2015,

beginning at 10:00 am under the authority of the Federal Rules of Civil Procedure 26 and 30. The deposition shall be taken before a court reporter authorized to administer oaths, shall be recorded by video and stenographic means, and shall continue from day to day until completed for purposes of discovery and all other purposes permitted by law. Under Federal Rule of Civil Procedure 30, the representative(s) designated by Corporate Funding shall be the person or persons who are most knowledgeable, able and competent to testify concerning the areas listed on Exhibit "A" attached hereto and incorporated by reference.

This 28th of January, 2015.

GEORGIA BUSINESS LAW GROUP, LLC

/B. Greg Cline/  
B. Greg Cline  
Georgia State Bar No. 170410  
Telephone: (770) 670-6203  
Facsimile: (770) 670-6213  
bgcline@gabusinesslawgroup.com  
**2 Ravinia Drive**  
**Suite 650**  
**Atlanta, GA 30346**  
**Attorney for Plaintiff The DeLoach Group, Inc.**  
**d/b/a Quastar Computer International**

## **EXHIBIT" A"**

### **A. DEFINITIONS**

1. "Person" means natural persons, corporations, partnerships, sole proprietorships, unions, associations, federations, or any other kind of entity.

2. "Document" is every record of any type whatsoever.

3. "Complaint" means the initial complaint that Plaintiff filed to commence this action and any and all amended complaints that may be filed in this action.

4. As used herein, the term "Ashford Finance", "you," or "your" refers to Ashford Finance, LLC , its parent, subsidiary, related companies and /or attorneys, agents, servants, representatives, employees, successors, predecessors, assigns, and others who have obtained information foror on behalf of Ashford Finance.

5. As used herein, the term "Plaintiff" refers to Plaintiff

The DeLoach Group, Inc. d/b/a Quastar Computer International, Plaintiff named in the caption above, its attorneys, agents, servants, representatives, employees, successors, predecessors, assigns..

6. "Identify" or "describe" when used in reference to:

A. An individual, shall mean to state his or her full name, present or last known business and residential address (designating which), business and residential telephone numbers (designating which), and the name and address of his or her employer.

B. A firm, partnership, corporation, proprietorship, association, or other organization or entity, shall mean to state its full name, present or last

known address, telephone numbers, and the legal form of such entity or organization.

C. An act, action, or omission, shall mean to state a description of the act, the date(s) on which it occurred, where it occurred, the identity of the person or persons performing said act (or in the case of an omission, the person or persons failing to act), the identity of all persons who have knowledge, information or belief about the act, when the act or omission first became known to you, and the circumstances and manner in which you first obtained such knowledge.

D. A communication shall mean to state the date, location, and nature of the communication, the identities of the communicator and communicatee, the subject matter and substance of the communication, whether it was recorded or otherwise memorialized, the identity of any witnesses thereto, and identify any documents memorializing or constituting the communication. If the communication was by telephone, state the telephone number from which the communication originated and the telephone number called.

E. A date shall mean to state the exact day, month and year, if ascertainable, or, if not, the best approximation, including relationship to other events.

7. The singular, plural, masculine, feminine, or neuter form of any noun or pronoun shall be read and be applied as including its other forms, as circumstances may make appropriate.

8. The terms "and" and "or" shall mean and/or.

## **B. TOPICS**

1. The most knowledgeable individual concerning Ashford Finance's relationship, communications or any dealings whatsoever with the following entities and individuals:

- (a) Carrefour Informatique Tremblant, Inc. ("Carrefour");
- (b) Mr. Prom Sokhonna;
- (c) Mr. Mike Tones;
- (d) Individual by the first name of "Sophie" who purportedly worked for Carrefour;
- (e) Mr. Simon Assaraf a/k/a Simone Asseraf;
- (f) Ganges Exports USA;
- (g) LC.COM, Ltd.;
- (h) Ashford Finance, LLC;
- (i) First American Bank of Illinois;
- (j) Ms. Patti Marshall of First American Bank of Illinois;
- (k) Marshall Jablon;
- (l) Corporate Funding Partners, LLC;
- (m) Any entity owned and/or controlled by Marshall Jablon, including but not limited to, Fin-Trade, Ltd., Tellarian Funding, Ltd, Letter-Credit, Ltd., including any trade names used by Mr. Jablon or the companies he owns and controls;

- (n) Dependable Component Supply, Inc.;
- (o) Pyramid Technology Enterprises, Inc.;
- (p) Fusion Trade, Inc.;
- (q) Pomeroy IT Solutions, Inc.;
- (r) Forest Computers and forestcomputers.com;
- (s) Amin Haq, including his prior and current addresses and whereabouts;
- (t) Beem Khemaney, including his prior and current addresses and whereabouts ;
- (u) An individual named "Rameesh" who is identified in Plaintiff's complaint, including his prior and current addresses and whereabouts;
- (v) Mike Tones, including his prior and current addresses and whereabouts;
- (u) An individual named "Sophie" who is identified in Plaintiff's complaint, including her prior and current addresses and whereabouts

2. Any and all employees who were responsible, did work for or were involved in any business transaction, proposed transaction with or for the benefit for Carrefour, including but not limited transactions involving letters of credit involving Carrefour.

3. The person that was responsible for the reporting and/or accounting in the financial records of Ashford Finance of any financial transaction involving or relating to a) any remuneration received by, or from or as a result of any transaction involving Carrefour; b) any remuneration received by, or from or as a

result of any transaction involving Ganges Exports USA; c) any remuneration received by, or from or as a result of any transaction involving Forest Computers and/or forestcomputers.com; and d) any remuneration received by, or from or as a result of any transaction involving Corporate Funding Partners and/or any entity owned and controlled by Marshall Jablon, including LC.com, Ltd, Fin-Trade, Ltd., Tellarian Funding, Ltd, Letter-Credit, Ltd. .

4. The most knowledgeable individual who was the principal decision maker, participant or main business person responsible for Ashford Finance's role in the letter of credit transaction at issue in the case involving the Plaintiff.

5. The most knowledgeable individual who was the principal decision maker, participant or main business person responsible for Ashford Finance's role in the letter of credit transaction at issue in the case involving the similar transactions identified in Plaintiff's complaint with Dependable Component Supply, Inc., Pyramid Technology Enterprises, Inc., Fusion Trade, Inc. and Pomeroy IT Solutions, Inc.

6. The most knowledgeable individual about communications that the following individuals who are or were employee and/or agents of Ashford Finance had concerning the transaction at issue in the transactions involving Dependable Component Supply, Inc., Pyramid Technology Enterprises, Inc., Fusion Trade, Inc. and Pomeroy IT Solutions, Inc.:

- a) Noushir Hasan;
- b) Alex Villeral;

- c) Leon Mikhlin;
- d) Aliette Frangi;
- e) Frederick Snow;
- f) Nadya Velikodanova;
- g) Maile Ho;
- h) the person that has an email tag of "**ymartinez**".

7. The person most knowledgeable about all matters pertaining to Ashford Finance's role in letters of credit transactions.

8. The person most knowledgeable about all matters pertaining to shipping compliance certificates in letter of credit transactions.

9. The person most knowledgeable about all matters pertaining to any waivers given by Ashford Finance to discrepancies and/or conditions contained in letters of credit transactions.

10. The person most knowledgeable about all matters pertaining to Ashford Finance's responses to Plaintiff's discovery responses.

11. The person most knowledgeable about all matters pertaining to the letter of credit transaction at issue in Plaintiff's complaint.

12. The person most knowledgeable about all matters pertaining to Ashford Finance's affirmative defenses stated in Ashford Finance's answer to Plaintiff's complaint.

13. The person most knowledgeable about all matters pertaining to Ashford Finance's relationship with First American Bank of Illinois.



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ASHFORD FINANCE, LLC, NOUSHIR  
HASAN, CARREFOUR INFORMATIQUE  
TREMBLANT, INC., CORPORATE  
FUNDING PARTNERS, LLC d/b/a  
GANGES EXPORTS USA, LC.COM, LTD,  
MARSHALL JABLON, MIKE TONES,  
AMIN HAQ and BEEM KHEMANEY,  
Defendants

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12th day of January, 2015, Notice of  
30(b)(6) deposition of Ashford Finance, LLC being served this day on all  
counsel of record by email.

/Bentley Greg Cline/

B. Greg Cline

Georgia State Bar No. 170410

*Attorney for Plaintiff The DeLoach Group, Inc.*